

IN THE DISTRICT COURT OF THE UNITED STATES
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

UNITED STATES OF AMERICA,)	
)	CASE NUMBER: 2:22-cr-00993-RMG
Plaintiff,)	
v.)	MOTION FOR ORDER AUTHORIZING
)	TRAVEL OUTSIDE OF CHARLESTON
JONATHAN RAMACI,)	COUNTY
)	
Defendant.)	

PLEASE TAKE NOTICE that the Defendant, by and through undersigned counsel, hereby respectfully moves this Court for an Order allowing Defendant to travel outside of Charleston County, South Carolina to the following locations on the below referenced dates, for the reasons set forth herein.

BACKGROUND

On December 7, 2022, Defendant was charged in the instant Indictment with three counts of Wire Fraud, in violation of 18 U.S.C. § 1343. ECF No. 3. On December 15, 2022, a bond hearing was held before United States Magistrate Judge Molly Cherry, at which time Defendant was released on a \$100,000.00 secured bond. ECF No. 25. Thereafter, the Court entered an Order setting Defendant's conditions of release, which, in relevant part, restricted Defendant's ability to travel outside of Charleston County.¹ See ECF No. 26. To date, Defendant has complied with all conditions of his bond and has appeared at all required court proceedings.

¹ On October 18, 2023, the Court entered an Order Temporarily Modifying Defendant's Conditions of Release in order to the allow him to travel to Italy for business purposes. See ECF Nos. 64, 67. Defendant complied with all of the terms and conditions of the Court's Order and promptly reported back to Probation upon his return to the country.

ARGUMENT

Defendant respectfully requests an Order from the Court enabling him to travel outside of Charleston County to the below referenced locations on the following dates for family, medical, and holiday travel, as outlined below.

LOCATION	PURPOSE	DATE(S)
Brookgreen Gardens, 1931 Brookgreen Dr, Murrells Inlet, SC 29576	Defendant plans to drive to Brookgreen Gardens with his family on a day trip to see the Christmas display.	December 13, 2023 (Day-Trip)
Roper St. Francis Berkeley Hospital, 100 Callen Blvd. Summerville, SC 29486	Defendant plans to drive to Roper St. Francis Medical Center in Summerville to pick up his wife after her surgery.	December 18, 2023
Daisytown, Washington County, Pennsylvania	Defendant plans to drive to Daisytown, Pennsylvania, which is located outside of Pittsburg, to visit his in-laws for the holidays.	December 22, 2023- January 2, 2024

Defendant respectfully submits that his travel requests are appropriately limited in scope and purpose. Moreover, Defendant does not present a flight risk. He has appeared at all required court proceedings and has maintained contact with undersigned counsel and Probation throughout this case, including during his international business trip to Italy. Moreover, Defendant will certainly comply with any additional conditions that the Court or Probation deems necessary and proper.

Defendant contacted Probation Officer Graham regarding the above referenced travel requests. Officer Graham indicated that he did not oppose Defendant's travel requests but informed him that he would need to obtain Court approval. Undersigned counsel also attempted to consult with AUSA Amy Bower regarding this motion but did not receive a response prior to filing.

CONCLUSION

WHEREFORE, Defendant respectfully requests the Court enter an Order allowing him to travel outside of Charleston County on December 13, 2023, December 18, 2023, and December 22, 2023 through January 2, 2024 for family, medical, and holiday related travel as outlined herein.

Respectfully submitted,

s /Jerry N. Theos

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ATTORNEYS FOR DEFENDANT

December 11, 2023
Charleston, SC